

**INTEGRATIVE THERAPEUTICS INC.™**NF Formulas PhytoPharmica
Tyler Encapsulations Vitaline Formulas9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070

P: 503.582.8386 F: 503.582.0467

ENZYMATIC THERAPY®&
PHYTOPHARMICA®

825 Challenger Drive, Green Bay, WI 54311-8328

P: 920.469.1313 F: 888.570.6460 (Enzymatic)

P: 920.469.9099 F: 920.469.4418 (Phyto)

ENZYMATIC THERAPYWhat *Better* feels like™

June 6, 2005

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

JUN 23 2005

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
FlexAgility™* Max	The Performance Advantage™ line of supplements was created specifically for athletes looking to enhance their athletic abilities, improve performance and speed post-activity recovery.*	Vitamin C (ascorbic acid), Proprietary Flex Blend hops (<i>Humulus lupulus</i>) (IsoOxygene™ brand) flower extract, ginger (<i>Zingiber officinale</i>) rhizome extract, Boswellia serrata gum extract, Bormelain, Japanese Sophora (<i>Sophora japonica</i>) Flower Bud, European Elder (<i>Sambucus nigra</i>) Berry Extract, Green Tea (<i>Camellia sinensis</i>) Leaf Extract, N-Acetylcysteine (NAC)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: Robert C. DosterRobert C. Doster
Title: Senior Vice President of Scientific AffairsDate: 6/6/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Sincerely,

Michael P. Devereux
Chief Financial Officer

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FlexAgility Max 42c

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PRODUCT NAME	STATEMENT	INGREDIENT(S) TO WHICH THE CLAIM REFERS
FlexAgility™* Max	FlexAgility MAX with FlexBlend supports your body's natural anti-inflammatory response to improve flexibility and reduce pain from occasional overuse.*	Vitamin C (ascorbic acid), Proprietary Flex Blend hops (<i>Humulus lupulus</i>) (IsoOxygene™ brand) flower extract, ginger (<i>Zingiber officinale</i>) rhizome extract, Boswellia serrata gum extract, Bormelain, Japanese Sophora (<i>Sophora japonica</i>) Flower Bud, European Elder (<i>Sambucus nigra</i>) Berry Extract, Green Tea (<i>Camellia sinensis</i>) Leaf Extract, N-Acetylcysteine (NAC)

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